

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 9300 East Hampton Drive Capitol Heights, MD 20743

RE:

Futaris, Inc.

EB Docket No. 06-36; CY2015

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2015 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of the Futaris, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to cwightman@tminc.com.

Thank you for your assistance in this matter.

Sincerely,

/s/ Connie Wightman Consultant

cc:

Valerie Pettit - Vis Email

file:

FCC - FCC

tms:

FCCx1601

Enclosures CW/lw

# ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016:

Covering calendar year 2015

Name of company(s) covered by this certification:

Futaris, Inc.

Form 499 Filer ID:

815887

Name of signatory:

Valerie Pettit

Title of signatory:

President

- I, Valerie Pettit, certify that I am an officer of the company named above, and acting as
  an agent of the company, that I have personal knowledge that the company has
  established operating procedures that are adequate to ensure compliance with the
  Commission's CPNI rules. See 47 C.F.R. §64.2001 et seq.
- Attached to this certification is an accompanying statement explaining how the
  company's procedures ensure that the company is in compliance with the requirements
  (including those mandating the adoption of CPNI procedures, training, recordkeeping,
  and supervisory review) set forth in §64.2001 et seq. of the Commission's rules.
- 3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
- The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Valerie Pettit DN: c=U.S. Government, ou: ou=VeriSign, Inc., ou=Futaris, Inc.,

Digitally signed by Valerie Pettit DN: c=US, o=U.S. Government, ou=ECA, ou=VeriSign, Inc., ou=Futaris, Inc., cn=Valerie Pettit Date: 2016.02.25 09:52:08 -09'00'

Valerie Pettit, President Futaris, Inc.

Date:

2/25/2016

Attachments:

Accompanying Statement explaining CPNI procedures

Explanation of actions taken against data brokers (not applicable, see Statement)

Summary of customer complaints (not applicable, See Statement)

#### Attachment A

### Statement of CPNI Procedures and Compliance

Calendar Year 2015

## Attachment A Statement of CPNI Procedures and Compliance Futaris, Inc.

#### USE OF CPNI

Futaris, Inc. ("Futaris") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Futaris has trained its personnel not to use CPNI for marketing purposes. Should Futaris elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Futaris does have CPNI, including call detail information concerning the calls made using the Company's services. However, this information is only made available to customers over the internet or in person pursuant to procedures described below.

#### PROTECTION OF CPNI

As set forth below, Futaris has put into place processes to safeguard its customers' CPNI (including call detail information) from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Requests for information must be sent in writing by the authorized party of record for the customer. Futaris responds back in writing, to the authorized customer representative at the primary address of record. The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to insure that procedures are being followed.

#### DISCLOSURE OF CALL DETAIL OVER PHONE

Futaris has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Futaris' authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. The company authenticates customers by requiring the customer to establish a password for this purpose. Customers are required to establish a password without the use of readily available biographical information or account information if they want to receive call detail over the telephone. If the appropriate password is not provided, Futaris does not disclose call detail over the telephone. Futaris does not offer a back-up authentication method, but does allow a customer to reset a lost password. Instructions for resetting the password are provided via mail or email to the address established by the customer of record.

In some instances involving a business customer with a dedicated account representative, the Company has agreements that address authentication procedures for disclosing CPNI that may differ from those described above.

The Company has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. The Customer of Record is notified by email that the account information has been updated or changed and is given instructions to notify the company's customer service number if the customer believes the account may have been updated or changed in error.

#### DISCLOSURE OF CPNI ONLINE

Futaris has instituted authentication procedures to safeguard the disclosure of CPNI online. Futaris's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Futaris authenticates customers by establishing a password with a security question for online access to the account. All customers are required to establish a password without the use of readily available biographical information or account information if they want to have on-line access to their CNPI. Unless the appropriate password is provided, Futaris does not allow on-line access to CPNI.

Futaris has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. Company's back-up authentication procedure operates as follows: If there is a change, an email is sent to the authorized representative of record who initially established the password. If the security question cannot be answered correctly, an Futaris representative will call back the authorized representative of record at the address of record to reset the password.

Futaris has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. If the customer calls Futaris due to a problem with the online access, Futaris will call back the contact at the address of record to resolve the issue.

#### DISCLOSURE OF CPNI AT RETAIL LOCATIONS

Futaris does not have any retail locations and therefore does not disclose CPNI in-store.

#### NOTIFICATION TO LAW ENFORCEMENT

Futaris has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

Futaris maintains written records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

#### ACTIONS AGAINST DATA BROKERS

Futaris has not taken any actions against data brokers in the last year.

#### CUSTOMER COMPLAINTS ABOUT CPNI BREACHES

Futaris did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2015.

#### INFORMATION ABOUT PRETEXTERS

Futaris has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI by adhering to the guidelines described herein for access to CPNI. Futaris is committed to notify the FCC of any new or novel methods of pretexting that it encounters and of any actions Futaris takes against pretexters and data brokers.